

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

| | | |
|------------------------------------|---|--------------------------|
| In re: |) | Case No. 08-35653 (KRH) |
| |) | |
| CIRCUIT CITY STORES, INC., et al., |) | Chapter 11 |
| |) | |
| Debtors. |) | (Jointly Administered) |
| |) | |
| ALFRED H. SIEGEL, AS TRUSTEE OF |) | |
| THE CIRCUIT CITY STORES, INC. |) | Adv. Proc. No. 10- 03457 |
| LIQUIDATING TRUST, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | |
| |) | |
| SENNCO SOLUTIONS, INC., |) | |
| |) | |
| Defendant. |) | |

**MOTION PURSUANT TO LBR 2090-1(E)(2)
FOR ADMISSION PRO HAC VICE**

COMES NOW John C. Smith (“Movant”) of DurretteBradshaw PLC, a member in good standing of the Bar of the Commonwealth of Virginia and an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia, and hereby moves the Court pursuant to this Motion (the “Motion”) for the entry of an Order substantially in the form of Exhibit “A” authorizing Jeffrey D. Corso (“Mr. Corso”), a lawyer whose address is 4925 Indiana Avenue, Lisle, Illinois 60532, to appear and practice *pro hac vice* on behalf of Sennco

Jeffery D. Corso (pro hac vice request pending)
Cooney & Corso, LLC
4925 Indiana Avenue
Lisle, IL 60532
Telephone: (630) 336-7393
Fax: (630) 324-7801
Counsel for Sennco Solutions, Inc.

John C. Smith (VSB # 44556)
DurretteBradshaw PLC
Bank of America Center,
1111 East Main Street, 16th Floor
Richmond, VA 23219
Telephone: (804) 775-6900
Fax: (804) 775-6911
Local Counsel

Solutions, Inc., the named Defendant in the above-captioned matter now pending in the United States Bankruptcy Court for the Eastern District of Virginia and any related litigation or proceedings pursuant to LBR 2090-1(E)(2). In support of this Motion, the Movant states as follows:

1. Mr. Corso is admitted, practicing and in good standing as a member of the bar of the State of Illinois. He is admitted to practice before the United States District Court for the Northern District of Illinois, Central District of Illinois, Northern District of Texas, the United States Bankruptcy Courts for the Northern District of Illinois and Northern District of Indiana, the United States Court of Appeals for the Seventh Circuit and the United States Supreme Court. Mr. Corso has been practicing law since 1989. There are no disciplinary proceedings pending against Mr. Corso.

2. Pursuant to LBR 2090-1(E)(2), “an attorney from another State . . . may appear and practice in cases *pro hac vice* before this Court upon motion of a member of the Bar of this Court, provided that in all appearances said attorney shall be accompanied by a member of this Bar.”

3. Movant requests the Court to allow Mr. Corso to file pleadings and to appear at hearings in these Chapter 11 cases.

4. Notice of this Motion has been given to the Plaintiff. In light of the nature of the relief requested, the Debtors respectfully submit that no further notice is required.

5. An Application pursuant to LBR 2090-1(E)(2)(a) is attached as Exhibit “B.”

WHEREFORE, the Movant respectfully requests that the Court enter an Order, substantially in the form attached as Exhibit “A” (a) authorizing Mr. Corso to appear and

practice *pro hac vice* on behalf of Sennco Solutions, Inc. and (b) granting such other and further relief as is just and proper.

Dated: January 28, 2011

Respectfully submitted,

/s/ John C. Smith.

John C. Smith (VSB # 44556)
DurretteBradshaw PLC
1111 East Main Street, 16th Floor
Richmond, Virginia 23219
(804) 775-6900 Telephone
(804) 775-6911 Facsimile

and

Jeffrey D. Corso, Esq. (pro hac pending)
Cooney & Corso, LLC
4925 Indiana Avenue
Lisle, Illinois 60532
Telephone: (630) 336-7393
Fax: (630) 324-7801
Counsel to Defendant Sennco Solutions, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on January 28, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Lynn L. Tavenner, Esq.
Paula S. Beran, Esq.
TAVENNER & BERAN, PLC
20 North Eighth Street, 2nd Floor
Richmond, Virginia 23219

/s/ John C. Smith

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

| | | |
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| In re: |) | Case No. 08-35653 (KRH) |
| |) | |
| CIRCUIT CITY STORES, INC., et al., |) | Chapter 11 |
| |) | |
| Debtors. |) | (Jointly Administered) |
| |) | |

**ORDER GRANTING MOTION PURSUANT TO
LBR 2090-1(E)(2) FOR ADMISSION *PRO HAC VICE***

Upon the Motion (the “Motion”) of John C. Smith, for the admission *pro hac vice* of Jeffrey D. Corso (“Mr. Corso”) a lawyer whose address is 4925 Indiana Avenue, Lisle, Illinois 60532; it appearing that the relief requested is in the best interests of the Debtors’ estates, their creditors and other parties in interest; the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§157 and 1334; consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. §157(b); venue being proper before this Court pursuant to 28 U.S.C. §§1408 and 1409; and after due deliberation and sufficient cause appearing therefore, it is hereby ORDERED:

1. The Motion is GRANTED.
2. Mr. Corso is authorized to appear and practice *pro hac vice* as counsel to Sennco Solutions, Inc. in the above-captioned matter and all related adversary proceedings.

Jeffrey D. Corso (pro hac vice request pending)
Cooney & Corso, LLC
4925 Indiana Avenue
Lisle, IL 60532
Telephone: (630) 336-7398
Fax: (630) 324-7801
Counsel for Sennco Solutions, Inc.

John C. Smith (VSB # 44556)
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Bank of America Center,
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Richmond, VA 23219
Telephone: (804) 775-6900
Fax: (804) 775-6911
Local Counsel

3. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

4. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

ENTERED:

United States Bankruptcy Court Judge

ENTERED ON DOCKET:

I ask for this:

/s/ John C. Smith
John C. Smith (VSB # 44556)
DurretteBradshaw PLC
1111 East Main Street, 16th Floor
Richmond, Virginia 23219
(804) 775-6900 Telephone
(804) 775-6911 Facsimile
Local Counsel for Sennco Solutions, Inc.

LBR 9022-1(C)(1) Certification

I hereby certify that the foregoing proposed order has been endorsed by all necessary parties.

/s/ John C. Smith

COPIES TO:

John C. Smith, Esq.
DURRETTEBRADSHAW PLC
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Robert Feinstein, Esq.
John Morris, Esq.
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Jeffrey S. Corso, Esq.
COONEY & CORSO, LLC
4925 Indiana Avenue
Lisle, Illinois 60532

EXHIBIT B

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

APPLICATION TO QUALIFY AS A FOREIGN ATTORNEY UNDER
LOCAL BANKRUPTCY RULE 2090-1(E)(2)

In Case No.: 08-35653 KRH, * Case Name In re: Circuit City/Siegel, Trustee v. Sennco Solutions, Inc. (10-03457)

PERSONAL STATEMENT

FULL NAME (no initials, please) Jeffrey David Corso

Bar Identification Number 6206210 State Illinois

Firm Name Cooney & Cors, LLC

Firm Phone # 630-324-7800 Direct Dial # 630-336-7393 FAX # 630-324-7801

E-Mail Address jcorso@cooneycorso.com

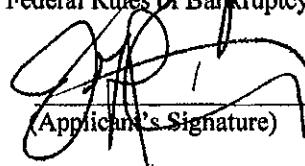
Office Mailing Address 4925 Indiana Ave.

Name(s) of federal court(s) in which I have been admitted N.D. Ill, C.D. Ill, N.D. Ind. (Bankruptcy only), N.D. Texas

I certify that the rules of the federal court in the district in which I maintain my office extend a similar *pro hac vice* admission privilege to members of the bar of the Eastern District of Virginia.

I have not been reprimanded in any court nor has there been any action in any court pertaining to my conduct or fitness as a member of the bar.

I hereby certify that, within 90 days before the submission of this application, I have read the Local Rules of this Court and that my knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Federal Rules of Evidence is current.



(Applicant's Signature)

I, the undersigned, do certify that I am a member of the bar of this Court, not related to the applicant; that I know the applicant personally, that the said applicant possesses all of the qualifications required for admission to the bar of this Court; that I have examined the applicant's personal statement. I affirm that his/her personal and professional character and standing are good, and petition the court to admit the applicant *pro hac vice*.


(Signature)

January 28, 2011

(Date)

JOHN C. SMITH
(Typed or Printed Name)

**Pro hac vice* admission in a case shall include an adversary proceeding(s) in the case.